

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

**77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590**

Reply to the Attention Of: SR-6J

September 4, 2007

Via E-mail and Hard Copy

Jennifer Hale
Environment Health & Safety, WTC 2G2
P.O. Box 9777
Federal Way, WA 98063-9777

RE: Disposal of PCB contaminated material at 12th Street Landfill
12th Street Landfill, Kalamazoo River Superfund Site Operable Unit #04
Plainwell, Michigan

Dear Ms. Hale:

Weyerhaeuser and RMT inc., your contracted representatives, have discussed with U.S. EPA the potential of bringing PCB contaminated material excavated from the Plainwell Mill to the 12th Street Landfill (OU-2) for disposal. U.S. EPA has a number of serious concerns about any plans to bring material to the 12th Street Landfill from other locations.

The Record of Decision ROD for OU-2 makes no mention of material from outside of the landfill being disposed of at the location. If Weyerhaeuser were to bring material from Plainwell to OU-2 for disposal, U.S.EPA would likely require either a Explanation of Significant Difference (ESD) or a Rod Amendment prior to any materials could be brought over to the OU-2. 300.435 (c)(2)

Relations between the citizens that neighbor the Kalamazoo Site, the Performing Parties and U.S. EPA were stressed and damaged during the recent attempts by Performing Parties attempts to dispose of materials at the Allied Landfill (OU-1). The fallout from these activities has been that the Performing Parties, U.S. EPA and MDEQ have committed a good deal of time and resources to public outreach so as to win back public support for a cleanup of the Site. U.S. EPA is concerned that another attempt to dispose of contaminated materials at one of the landfills would inflame the public and jeopardize the goodwill that the Performing Parties and U.S. EPA has been building with the local community over the past couple months. If public support for this project were to fall apart again, this would be costly and greatly delay all activity at the Kalamazoo Superfund Site.



If material were to be taken from the Plainwell Mill to a non-TOSCA landfill, U.S. EPA would require that

Delay of an emergency action.

for 12th Street Landfill, Kalamazoo River Superfund Site Operable Unit #04, Plainwell, Michigan, dated June, 2007 (WP, FSP).

Sincerely,

Michael Berkoff
Remedial Project Manager
U.S EPA, Superfund Division
(312) 353-8983

cc via email: S. Borries, U.S. EPA
J. Saric, U.S. EPA
S. Chummar, U.S. EPA
L. Schmidt, U.S. EPA
M. Mankowski, U.S. EPA
E. Furey, U.S. EPA
J. Hutchens, RMT
P. Bucholtz, MDEQ